

## **Appendix H** Caltrans Headquarters VMT Memorandum

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# Memorandum

**To:** Gabriela Duran  
Associate Environmental Planner  
Caltrans District 12

**Date:** June 21, 2024

**From:** Chris Kuzak  
SB 743 Program Manager  
Caltrans HQ, Director's Office of Sustainability

**Subject:** Induced travel (VMT) Methodology & Results for I-5/EI Toro Road Interchange Improvement Project (12-0M980), dated May 24, 2024

Thank you for submitting the revised induced travel (VMT) methodology and results for the I-5/EI Toro Road Interchange Improvement Project (12-0M980), dated May 24, 2024. The purpose of the project is to improve traffic flow and traffic signal optimization, improve traffic mobility through adjacent local street intersections, reduce freeway ramp queuing, and apply technology to help manage traffic demand.

The project currently consists of three Build Alternatives:

- Build Alternative 1 – Braided ramps with Transportation System Management (TSM) and Transportation Demand Management (TDM)
- Build Alternative 2 – Flyover with roundabout with TSM/TDM
- Build Alternative 3 – TSM/TDM

HQ Sustainability has reviewed the provided project documents and agrees that the project does not appear to fall under a type that is likely to induce VMT per Section 5.1.1 of the Transportation Analysis Under CEQA (TAC).

We also agree that for Build Alternatives 1 and 2, reconfiguration of the SB I-5 ramps is primarily operational and any minor changes to the length of trips (reduction or slight increase) because of SB ramp realignments and splitting exiting vehicles to different local streets appear unlikely to increase overall traffic demand. Additionally, Alternative 3 TSM/TDM (e.g., ramp metering, signal timing/coordination, intersection technology) does not include physical improvements that have the potential to increase roadway capacity and can be screened as unlikely to induce VMT. Therefore, we concur that the project would not lead to a measurable and substantial increase in vehicle travel.

As noted in Section 5.3 of the TAC (page 18), any analysis of VMT impacts must be supported by “substantial evidence” as defined in CEQA Guidelines section 15384. As much as possible, HQ Sustainability recommends providing references and citations for analysis assumptions in the environmental document.

These comments are based on an initial understanding of the aforementioned documents submitted to Caltrans. Should there be changes to the project scope, our comments may also be subject to change. If you have any questions, please contact [SB743.implementation@dot.ca.gov](mailto:SB743.implementation@dot.ca.gov).